

Hearing Date and Time: June 25, 2009 at 9:45 a.m.
Objections Due: June 19, 2009 at 4:00 p.m.

Barry E. Bressler (*admitted pro hac vice*)
Richard A. Barkasy (*admitted pro hac vice*)
Benjamin P. Deutsch (BD-5435)
SCHNADER HARRISON SEGAL & LEWIS LLP
140 Broadway, Suite 3100
New York, NY 10005-1101
Phone: (212) 973-8000
Fax: (212) 972-8798
*Attorneys for the Ad Hoc
Committee of Consumer Victims of General Motors*

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X
In re: : Chapter 11
: :
GENERAL MOTORS CORP., *et al.*, : Case No. 09-50026 (REG)
: :
Debtors. : (Jointly Administered)
-----X

**VERIFIED STATEMENT OF SCHNADER HARRISON SEGAL & LEWIS LLP
PURSUANT TO BANKRUPTCY RULE 2019**

Schnader Harrison Segal & Lewis LLP (“Schnader”) submits this verified statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure in connection with the above-captioned chapter 11 cases of General Motors Corp., *et al.* (collectively, the “Debtors”) and respectively states as follows:

1. Schnader is a limited liability professional partnership organized under the laws of the Commonwealth of Pennsylvania and maintains offices, among other locations, at 140 Broadway, Suite 3100 New York, NY 10005-1101.

2. Schnader has been retained to represent the Ad Hoc Committee of Consumer Victims of General Motors (the “Ad Hoc Committee”), the members of which each have tort claims, mostly involving personal injuries (including derivative claims and wrongful death actions) against GM. The members of Ad Hoc Committee are individuals who reside throughout the country. The identities of the Ad Hoc Committee members are set forth on Exhibit A.

3. Schnader also represents New United Motor Manufacturing, Inc. (“NUMMI”). Schnader’s representation of NUMMI involves NUMMI’s executory contracts with GM and the assumption or rejection thereof.

4. Schnader itself does not hold any claims, as defined by 11 U.S.C. § 101(5), against the Debtors.

5. The filing of this Statement does not constitute a waiver of any rights by any member of the Ad Hoc Committee or NUMMI, including the following: (i) rights to have final orders in non-core matters entered only after *de novo* review by a judge of the United States District Court; (ii) rights to trial by jury in any proceeding and on any trial on their claims; (iii) rights to have the reference withdrawn by the United States District Court; (iv) rights concerning the jurisdiction of the bankruptcy court over them or their claims; or (v) any other rights, claims, actions, defenses, setoffs, or right of recoupment to which the Ad Hoc Committee members or NUMMI are or may be entitled to under any agreements, at law, or in equity, all of which are expressly reserved.

6. In the event that Schnader undertakes additional representation of other clients in these Chapter 11 cases, this Statement shall be supplemented in accordance with Bankruptcy Rule 2019.

SCHNADER HARRISON SEGAL
& LEWIS LLP

Dated: June 19, 2009

By: /s/ Benjamin P. Deutsch

Benjamin P. Deutsch (BD-5435)
bdeutsch@schnader.com
140 Broadway, Suite 3100
New York, NY 10005-1101
Phone: (212) 973-8000
Fax: (212) 972-8798

-and-

Barry E. Bressler, Esquire
(*admitted pro hac vice*)
bbressler@schnader.com
Richard A. Barkasy, Esquire
(*admitted pro hac vice*)
rbarkasy@schnader.com
1600 Market Street, Suite 3600
Philadelphia, PA 19103-7286
Phone: (215) 751-2000
Fax: (215) 751-2205

*Attorneys for the Ad Hoc Committee of
Consumer Victims of General Motors*

Verification

I, Benjamin P. Deutsch, Esq., a partner with Schnader Harrison Segal & Lewis LLP, a law firm with offices at 1600 Market Street, Suite 3600, Philadelphia, PA 19103-7286, as well as an office maintained at 140 Broadway, Suite 3100 New York, NY 10005-1101, declare under the penalty of perjury that I have read the foregoing Verified Statement of Schnader Harrison Segal & Lewis LLP Pursuant to Bankruptcy Rule 2019 and that it is true and correct to the best of my knowledge, information and belief.

Dated: June 19, 2009

By: /s/ Benjamin P. Deutsch
Benjamin P. Deutsch (BD-5435)